

# **EXHIBIT HH**

*Wampler Buchanan & Breen*

*A Professional Association  
Attorneys and Counselors at Law  
900 SunTrust Building  
777 Brickell Avenue  
Miami, Florida 33131*

(305) 577-0044

FAX (305) 577-8545

December 9, 1999

**VIA HAND DELIVERY**

Thomas E. Scott, Esquire  
United States Attorney  
Southern District of Florida  
99 N.E. 4th Street  
Miami, Florida 33132

**CERTIFIED MAIL. RETURN  
RECEIPT REQUESTED**

The Honorable Janet Reno  
Attorney General  
U.S. Department of Justice  
10th St. & Constitution Avenue  
Washington, D.C. 20530

**RE: Filing of Third Amended Complaint under existing modified sealing orders, which includes additional Defendants and drops two (2) Defendants in United States of America, Ex. Rel. Ven-A-Care of the Florida Keys, Inc. v. ABBOTT LABORATORIES, et al. CIVIL ACTION NO.95-1354-CIV-GOLD**

Dear Ms. Reno and Mr. Scott:

This law firm represents Ven-A-Care of the Florida Keys, Inc., a Florida corporation, as the Relator in the above-referenced "qui tam" action brought pursuant to 31 U.S.C. §§3729 and 3730, the original complaint having been filed on June 23, 1995.

This letter and its enclosures are being served upon you pursuant to the requirements of 31 U.S.C. §3730(b)(2) immediately prior to the filing of the Third Amended Complaint in camera and under existing modified sealing orders with the Clerk, United States District Court, Southern District of Florida.

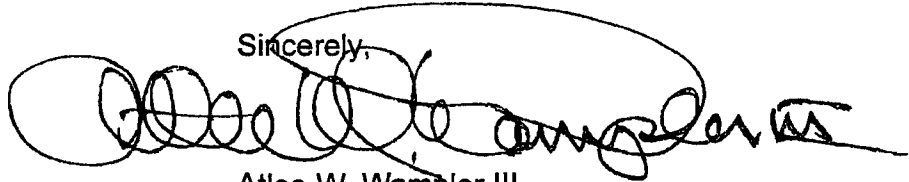
Enclosed you will find a copy of the Relator's Third Amended Complaint together with Motion for Leave to File Third Amended Complaint and for an Agreed Order Sealing Third Amended Complaint and all other Documents of the Case. You have been previously provided with substantially all material evidence and information possessed by the Relator.

The Honorable Janet Reno  
Thomas E. Scott, Esquire  
December 9, 1999  
Page 2

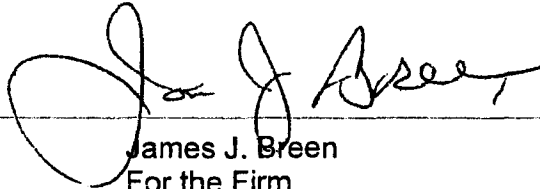
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In the event that you require any further assistance in your review of the Third Amended Complaint from the Relator or this law firm please contact either of the undersigned at any time.

Sincerely,



Atlee W. Wampler III  
For the Firm



James J. Breen  
For the Firm

AWW/pf  
Enclosures  
F:\CLIENTS\13027\3RDAMDOLET-REN.3AC

*Wampler Buchanan & Breen*

777 Birchell Avenue

(305) 577-0044

Miami, Florida 33131

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To Recipient's Name T. Reed Stephens, Esq Phone (202) 307-0404  
 Company U.S. Department of Justice  
 Address 601 "D" Street NW  
 Civil Division, Commercial Litigation  
 City Washington State DC ZIP 20044

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 Packages up to 150 lbs. Delivery commitment may be later in some areas.  
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☐ Sunday Delivery Available for FedEx Priority Overnight to select ZIP codes  
☐ HOLD Weekday at FedEx Location Not available with FedEx First Overnight  
☐ HOLD Saturday at FedEx Location Available for FedEx Priority Overnight and FedEx 2Day

Does this shipment contain dangerous goods?  
☒ No One box must be checked  
☐ Yes Shipper's Declaration required  
☐ Yes Shipper's Declaration not required  
☐ Dry Ice Dry Ice, 9, UN 1845 x \_\_\_\_\_ to  
☐ Cargo Aircraft Only  
 7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below  
☒ Sender Acct. No. in Section 1 will be billed  
☐ Recipient  
☐ Third Party  
☐ Credit Card  
☐ Cash/Check  
 FedEx Acct. No. \_\_\_\_\_ Exp. Date \_\_\_\_\_  
 Total Packages \_\_\_\_\_ Total Weight \_\_\_\_\_ Total Declared Value\* \$ \_\_\_\_\_  
 \*Our liability is limited to \$100 unless you declare a higher value. See back for details.  
 8 Release Signature Sign to authorize delivery without obtaining signature.

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.

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 City MIAMI State FL ZIP 33131

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First 34 characters will appear on invoice.

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 Sender's Name James J. Breen, Esq/KMc Phone (305) 577-0044

 Company WAMPLER BUCHANAN & BREEN

 Address 777 BRICKELL AVE STE 900 Dept./Floor/Suite/Room

 City MIAMI State FL ZIP 33131

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First 34 characters will appear on invoice.

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 Recipient's Name T. Reed Stephens, Esquire Phone (202) 307-0404

 Company U.S. Attorney's Office/Civil Division

 Address Commercial Litigation Branch

 Address 601 "D" Street, N.W. Dept./Floor/Suite/Room

 City Washington State D.C. ZIP 20004

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Draft 3rd Amend Comp.

0105822349

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 Packages up to 150 lbs.  
Delivery commitment may be later in some areas.  
☐ FedEx Priority Overnight Next business morning  
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☐ FedEx 2Day\* Second business day  
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 \* FedEx Letter Rate not available Minimum charge: One-pound rate

## 4b Express Freight Service

 Packages over 150 lbs.  
Delivery commitment may be later in some areas.  
☐ FedEx 1Day Freight\* Next business day  
☐ FedEx 2Day Freight Second business day  
☐ FedEx 3Day Freight Third business day  
 \* Call for Confirmation:

## 5 Packaging

 Declared value limit \$500  
☐ FedEx Letter\*  
☒ FedEx Pak\*  
☐ Other Pkg. Includes FedEx Box, FedEx Tube, and customer pkg.

## 6 Special Handling

☐ Saturday Delivery Available for FedEx Priority Overnight and FedEx 2Day  
☐ Sunday Delivery Available for FedEx Priority Overnight to select ZIP codes  
☐ HOLD Weekday at FedEx Location Not available with FedEx First Overnight  
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☐ Sunday Delivery Available for FedEx Priority Overnight to select ZIP codes  
☐ HOLD Weekday at FedEx Location Not available with FedEx First Overnight  
☐ HOLD Saturday at FedEx Location Available for FedEx Priority Overnight and FedEx 2Day to select locations

 Does this shipment contain dangerous goods?  
 One box must be checked.  
☒ Yes As per attached Shipper's Declaration  
☐ Yes Shipper's Declaration not required  
☐ Dry Ice Dry Ice, 9 UN 1845  
 Dangerous Goods cannot be shipped in FedEx packaging.

## 7 Payment Billed to:

 Enter FedEx Acct. No. or Credit Card No. below.  
☒ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages Total Weight Total Declared Value\*

\$ .00

\*Our liability is limited to \$100 unless you declare a higher value. See back for details.

## 8 Release Signature

Sign to authorize delivery without obtaining signature.

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.

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Company WAMPLER BUCHANAN & BREEN

Address 777 BRICKELL AVE STE 900 Dept./Floor/Suite/Room

City MIAMI State FL ZIP 33131

2 Your Internal Billing Reference 3027

to MARK A. Lavine, Esq. Phone (305) 961-9303

at U.S. Attorneys Office

as 99 NE 4th Street, 3rd Floor Dept./Floor/Suite/Room

at FedEx location, address here.

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☐ FedEx First Overnight Earliest next business morning delivery to select locations

☐ FedEx 2Day® Second business day

☒ FedEx Express Saver® Third business day

\* FedEx Letter Rate not available Minimum charge: One-pound rate

## 4b Express Freight Service

☐ FedEx 1Day Freight® Next business day

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\* Call for Confirmation

## 5 Packaging

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☒ FedEx Pak®

☐ Other Pkg. (Include FedEx Box, FedEx Tube, and customer pkg.)

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☐ Sunday Delivery Available for FedEx Priority Overnight to select ZIP codes

☐ HOLD Weekday at FedEx Location Not available with FedEx First Overnight

☐ HOLD Saturday at FedEx Location Available for FedEx Priority Overnight and FedEx 2Day to select locations

Does this shipment contain dangerous goods? One box must be checked.

☒ No ☐ Yes As per attached Shipper's Declaration

☐ Yes Shipper's Declaration not required

☐ Dry Ice UN 1845

☐ Cargo Aircraft Only

Dangerous Goods cannot be shipped in FedEx packaging.

## 7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender Acct. No. in Section 1 ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages Total Weight Total Declared Value\*

\$ .00

\*Our liability is limited to \$100 unless you declare a higher value. See back for details.

FedEx Use Only

## 8 Release Signature Sign to authorize delivery without obtaining signature.

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.

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**MAIL**

**WAMPLER, BUCHANAN & BREEN, P.A.**  
777 Brickell Avenue  
900 Sun Trust Building  
Miami, Florida 33131

Telephone: 305-577-0044

Facsimile: 305-577-8545

**THE HONORABLE JANET RENO**  
**ATTORNEY GENERAL**  
U. S. Department of Justice  
10<sup>th</sup> Street & Constitution Avenue  
Washington, DC 20530



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<b>SENDER:</b> <input type="checkbox"/> Complete items 1 and/or 2 for additional services. <input type="checkbox"/> Complete items 3, 4a, and 4b. <input type="checkbox"/> Print your name and address on the reverse of this form so that we can return this card to you. <input type="checkbox"/> Attach this form to the front of the mailpiece, or on the back if space does not permit. <input type="checkbox"/> Write "Return Receipt Requested" on the mailpiece below the article number. <input type="checkbox"/> The Return Receipt will show to whom the article was delivered and the date delivered.		<b>3. Article Addressed to:</b> Hon. Janet Reno, Atty General U. S. Department of Justice 10th Street & Constitution Ave. Washington, DC 20530	
<b>5. Received By: (Print Name)</b>  <b>6. Signature: (Addressee or Agent)</b> X		<b>4a. Article Number</b> Z 456 634 229 <b>4b. Service Type</b> <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <b>7. Date of Delivery</b>  <b>8. Addressee's Address (Only if requested and fee is paid)</b>  <b>PS Form 3811, December 1994</b>	

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<b>3. Article Addressed to:</b> Hon. Janet Reno, Atty General U. S. Department of Justice 10th Street & Constitution Ave. Washington, DC 20530		<b>4a. Article Number</b> Z 456 634 229 <b>4b. Service Type</b> <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <b>7. Date of Delivery</b>  <b>8. Addressee's Address (Only if requested and fee is paid)</b>  <b>5. Received By: (Print Name)</b>  <b>6. Signature: (Addressee or Agent)</b> X	

PS Form 3811, December 1994

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